

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHAIM FELDMAN	:	
Plaintiff	:	ANSWER TO COMPLAINT
Vs.	:	11-CIV-00494
	:	Judge Motz
SANDERS LEGAL GROUP	:	
and JOHN DOE 1-10, XYZ, INC 1-10	:	
ten names being fictitious	:	
and unknown to Plaintiff, the	:	
person or parties intended being	:	
the persons or parties, if any	:	
Defendants	:	

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The Defendant, SANDERS LEGAL GROUP, by and through the undersigned attorney, files this Answer to Plaintiff's Complaint as follows:

Denied that Plaintiff is entitled to any of the relief sought in Plaintiff's Complaint.

1. Denied that Plaintiff is entitled to any of the relief sought in Plaintiff's Complaint.
2. Admitted.
3. Without knowledge and therefore denied
4. Admitted as to address, denied that Defendant is a debt collector.
5. Denied.
6. Denied.
7. Denied.
8. Denied
9. Denied.

10. Denied.
11. Without knowledge and therefore denied.
12. Denied.
13. Denied.
14. Denied.
15. Defendant relies upon its previous responses.
16. Denied.
17. Denied.
18. Denied.
19. Denied.
20. Denied.
21. Denied.
22. Denied.
23. Denied.
24. Denied.
25. Defendant relies upon its previous responses.
26. Denied.
27. Denied.
28. Defendant relies upon its previous responses.
29. Denied that Plaintiff is entitled to relief.
30. Denied.
31. Denied.
32. Denied.

33. Defendant relies upon its previous responses.
34. Denied.
35. Denied.
36. Denied.
37. Defendant relies upon its previous responses.
38. Denied.
39. Denied.
40. Denied.
41. Denied.
42. Denied.
43. Defendant relies upon its previous responses.
44. Denied.
45. Denied.
46. Denied.

Defendant respectfully requests judgment be entered in favor of the Defendant, and specifically denies each prayer for judgment made by Plaintiff.

**AFFIRMATIVE DEFENSES**  
**FIRST AFFIRMATIVE DEFENSE**

Any damages to Plaintiff were caused by third parties, and not under the control of the Defendant.

**SECOND AFFIRMATIVE DEFENSE**

Plaintiff fails to state a cause of action.

**THIRD AFFIRMATIVE DEFENSE**

Defendant is entitled to a set off.

**FOURTH AFFIRMATIVE DEFENSE**

Plaintiff's claims should be barred based upon the doctrine of accord and satisfaction.

Dated this 10<sup>th</sup> day of August 2011.

**ANDERSON | PINKARD**

*/s/ Tracy Martinell Henry, Esq.*

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I HEREBY CERTIFY that on the \_\_\_\_ day of \_\_\_\_ 2011, I caused the foregoing Answer to Plaintiff's Complaint to be electronically filed with the Clerk of the Court using CM/ECF which will provide electronic notice of such filing to all counsel of record.

*/s/ Tracy Martinell Henry, Esq.*

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